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A LIMITED LIABILITY PARTNERSHIP

PRESTON COMMONS WEST • SUITE 460
8117 PRESTON ROAD
DALLAS, TEXAS 75225
WWW.ALLIPLAW.COM

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PAUL V. STORM
D. SCOTT HEMINGWAY

MALCOLM W. PIPES
ROBIN L. BARNES
DAWN C. WOLFF
CHARLES HERRICK

OF COUNSEL
JOHN W. MACPETERS
JOHN G. FISCHER
MARK D. PERDUE

WRITER'S DIRECT PHONE
(214) 292-8998
FACSIMILE (214) 292-8999
PAULSTORM@ALLIPLAW.COM

April 5, 2004

Edward W. Goldstein, Esq.
Goldstein & Faucett, LLP
1177 West Loop South, Suite 400
Houston, TX 77027

VIA FACSIMILE (713) 877-1145

Re: *Expanse Networks, Inc. v. Catalina Marketing Corp.*
Civil Action No. 02-CV-2857 in the Eastern District of Pennsylvania
Our Ref. No. CATA 02815 LPAT

Dear Ed:

In response to Plaintiff's letter to Court on Friday, in addition to the terms designated in our letter to you on April 2, Defendant designates the following additional claim terms as needing construction by Plaintiff. Additionally, for both patents, to the extent you construe terms repeated in subsequent claims differently than in prior claims, please provide your construction for each instance. Please let us know immediately if Plaintiff objects to providing this additional information on the timetable ordered by the Court.

U.S. No. 6,216,129

Claim 1

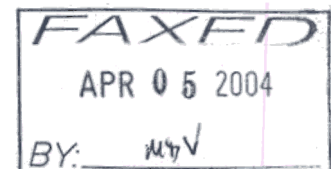
"advertisement profile";
"consumer profile";
"correlation factor";

Claim 17

"multiple transaction of the consumer"
"multiple points of sale"

Claim 22

"computer system"
"storage medium"



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“means for receiving the advertisement profile”
“means for retrieving the consumer profile”
“multiple point of sale transactions”
“detailed purchase records used to generate”
“means for calculating a correlation factor between”
“means for selecting ... responsive to said calculating a correlation factor.”

Claim 30

“generated from multiple transactions of the consumer”
“specific characteristics”
“source code segment for retrieving the advertisement profile”
“source code segment for retrieving the consumer profile”
“source code segment for calculating a correlation factor between”
“source code segment for selecting ... responsive to said calculating a correlation factor”

U.S. No. 6,298,348

Claim 17

“transactions performed by the consumer at multiple locations”
“detailed transaction records”
“inventory of the recorded transactions”
“set of heuristic rules associated with transactions within the detailed transaction records”

Claim 21

“means for retrieving the detailed purchase records”
“means for retrieving product characterization information”
“means for generating a profile of the consumer”

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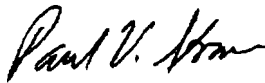
Claim 29

"source code segment for retrieving the detailed transaction records"

"source code segment for retrieving a set of heuristic rules"

"source code segment for generating a profile of the consumer based on the detailed transaction records and the set of heuristic rules."

Sincerely,



Paul V. Storm

cc: Edward W. Goldstein, Esq.
Steven M. Coren, Esq.
Justin Summer, Esq.
Camille Miller, Esq.

Via Facsimile
Via Facsimile
Via Electronic Mail
Via Electronic Mail